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Attorneys for Defendant Facebook, Inc.,

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: FACEBOOK, INC. CONSUMER
PRIVACY USER PROFILE LITIGATION,

This document relates to:

ALL ACTIONS

CASE NO. 3:18-MD-02843-VC

**FACEBOOK, INC.'S ADMINISTRATIVE
MOTION TO TEMPORARILY FILE
UNDER SEAL**

Pursuant to Civil Local Rules 7-11 and 79-5, Facebook, Inc. (“Facebook”) hereby submits this Administrative Motion to Temporarily File Under Seal (i) Facebook’s Request to Approve Facebook’s Search String Proposal for Custodian Groups 1-4, and (ii) exhibits to the Declaration of Martie Kutscher in support of Facebook’s Request to Approve Facebook’s Search String Proposal for Custodian Groups 1-4. These documents are being filed today pursuant to the Court’s Discovery Order No. 7. Dkt. 522. Facebook moves for leave to temporarily file under seal these submissions—which contain non-public details about Facebook employees, cite confidential documents, and incorporates arguments regarding Facebook’s confidential business information. On or before October 23, 2020, Facebook will file a particularized motion to seal. Plaintiffs have consented to the temporary filing of these submissions under seal. *See* Stipulation, Dkt. 542.

The submissions being filed under seal relate to the parties’ search term negotiations, which have continued into this afternoon. The submissions discuss sensitive Facebook business information that informed the selection of search strings and incorporate non-public details regarding potential custodians. Because the parties’ negotiations were ongoing through this afternoon, neither party was certain which search terms the parties would submit to the Court for resolution until shortly before the parties’ submissions were due. The parties therefore could not consult regarding which terms, documents, and related arguments needed to be filed under seal in advance of filing. Accordingly, and pursuant to the parties’ Stipulation, Dkt. 542, Facebook respectfully requests that the Court allow it to file these materials under seal temporarily. By October 23, 2020, Facebook will file a particularized motion as to the confidential content contained herein.

Dated: October 16, 2020

GIBSON, DUNN & CRUTCHER, LLP

By: /s/ Orin Snyder

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CERTIFICATE OF SERVICE

I, Orin Snyder, hereby certify that on October 16, 2020, I electronically filed the foregoing with the Clerk of the United States District Court for the Northern District of California using the CM/ECF system, which shall send electronic notification to all counsel of record.

By: /s/ Orin Snyder
Orin Snyder